IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

ePLUS INC.,)
Plaintiff,)
v.) Case No. 3:09CV620 (REP)
LAWSON SOFTWARE, INC.,)))
Defendant.)

DEFENDANT'S UNOPPOSED MOTION TO SEAL PORTIONS OF THE OCTOBER 24, 2012 HEARING TRANSCRIPT

Defendant Lawson Software, Inc. ("Lawson"), by counsel, hereby moves, pursuant to Local Rule 5, to seal from disclosure to the public certain portions of the transcript of the hearing held on October 24, 2012 on Plaintiff ePlus Inc.'s Motion to Enforce Court's Order of February 21, 2012 Compelling Production of Documents and Finding Waiver of Attorney-Client Privilege, and for Sanctions in order to preserve Lawson's claim that certain documents discussed at the hearing are subject to the attorney-client or attorney work product privileges.

In particular, Lawson moves to seal the following pages and lines of the hearing transcript: 23:15-23:23; 23:25-24:3; 24:22-25:9; 69:20-70:2; 107:21-107:23; 108:2-108:6; 108:8-108:18; 117:18-117:21; 117:23-118:1; 126:25-127:1; 127:18-127:20; and 127:22-127:23. Lawson has consulted with counsel for ePlus, and ePlus has no objection to sealing these portions of the transcript. Attached as Exhibit 1 and filed under seal is a copy of the hearing transcript which identifies the portions of the hearing transcript listed above.

In support of this Motion, Lawson submits contemporaneously herewith a Nonconfidential Memorandum in Support of Defendants' Unopposed Motion to Seal Hearing Transcript, along with an appropriate Notice and proposed Order.

LAWSON SOFTWARE, INC.

By: _	/s/	
•	Of Counsel	

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CERTIFICATE OF SERVICE

I certify that on this 9th day of November, 2012, a true copy of the foregoing will be delivered by email to::

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